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Conserving, Enhancing and Protecting Michigan's Natural Resources and Outdoors Heritage since 1937.

September 13, 2012

Senate Committee on Natural Resources, Environment and Great Lakes Senator Tom Casperson, Chair

Re: Senate Bill 1212

Dear Chairman Casperson and Committee Members,

We write to you today to state our strong opposition to Senate Bill 1212, a bill that relaxes Michigan's ballast water treatment requirements for oceangoing ships by allowing only ballast water exchange to meet Michigan's permit requirement for dumping ballast water.

Much is made of the potential for new jobs that may result from relaxing Michigan's ballast water requirements. But what is missed in this misguided argument is that there is no greater economic engine in Michigan than the Great Lakes themselves. There are hundreds of thousands of jobs that currently exist that require not only on the presence of the lakes, but their health and vitality as well. What is also missed is the staggering amount of money (between \$100-200 million) we spend each year just mitigating the damage caused by invasive species.

MUCC is concerned about the negative and wide-spread reach that aquatic invasive species have had on the Great Lakes and on businesses and citizens in just about every sector across the state, especially our fishery. The Great Lakes fishery is valued at over \$7 billion dollars and supports thousands of jobs. Michigan alone boasts over one million anglers who spend \$2 billion dollars every year on this passion. Anglers create a lot of economic activity and jobs, and we require healthy lakes to ensure stable and healthy fish populations.

It is well documented that ballast water discharged from oceangoing ships is the largest source of aquatic invasive species to the Great Lakes. In addition, both the U.S. EPA and U.S. Coast Guard have determined that ballast water exchange alone is not sufficient to protect the Great Lakes from new introductions of aquatic invasive species. In short, we should be moving forward with better ballast water protections, not going backwards.

Data shows that shipping trends have been on a downward trend across the Great Lakes well before Michigan's ballast water requirements went into effect. We are disappointed in the desire of our partners in the legislature to weaken Michigan's ballast water requirements for the purpose of increased shipping numbers when this is uncertain and, in reality, not probable. Weakening Michigan's laws protecting the Great Lakes increases the risk of more aquatic invasive species introductions to our fishery, with serious negative impact on our economy and existing jobs.

MUCC realizes that ballast water will continue to be an issue of concern around the Great Lakes until a protective and preventative standard is adopted and enforced uniformly across the Great Lakes. This will take the partnership and cooperation of all of the governments, both state and national, that boarder the Great Lakes. MUCC continues to work towards those ends and hopes the Michigan legislature will be an active partner in those efforts. Maintaining Michigan's ballast water protection standards is a critical step in accomplishing this.

We hope that you will join us in opposing SB 1212 and turn your energy towards ways in which we can achieve necessary protection against invasive species from the other governmental jurisdictions in the Great Lakes basin. The future of our fishery and our economy truly depend on keeping invasive species out of our lakes.

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Sincerely,

Erin McDonough
Executive Director

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